

## UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

Carlton Leonard Rason

Case No.

21-21-00263-JRS-DLP

(to be filled in by the Clerk's Office)

## Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Terre Haute, Indiana Police Department  
 City of Terre Haute (Code Enforcement)  
 Officers, Jeremy Bates, Kyle Toney  
 Jessie Chambers Michael Murphy, Kevin  
 Barrett Gerlach Defendant(s) See Attached  
 (Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one)



Yes



No

## COMPLAINT FOR A CIVIL CASE

## NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

Attachment

Carlton Leonard Rason  
1201 S Center St  
Terre Haute, IN 47802

(Plaintiff)

v.s

Terre Haute police department,  
City of Terre Haute, (Code Enforcement)  
(Officer) Jeremy Bales, (Officer) Kyle Toney, (Officer) Jessie  
Chambers, (Officer) Michael Mikuly, (Officer) Kevin Barrett,  
Gerald Kurdelak

AS, Individual

Lori  
Code Enforcement  
Officer

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

Carlton Leonard Raso  
1201 S Center St  
Terre Haute, IN 47802  
812-241-6559  
Carlton Raso 50@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

Terre Haute police department  
Terre Haute, IN 47803

## Defendant No. 2

Name  
Job or Title (*if known*)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (*if known*)

City of Terre Haute, IN (Code Enforcement)  
Terre Haute, IN 47803

## Defendant No. 3

Name

Jeremy Bates

Job or Title (if known)

Police Officer, Employed For Terre Haute  
Police Department

Street Address

Terre Haute, IN 47603

City and County

State and Zip Code

Telephone Number

E-mail Address (if known)

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

 Federal question

 Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C § 1983  
Racial Profiling

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual:

The plaintiff, (name) \_\_\_\_\_ is a citizen of the State of (name) \_\_\_\_\_, OR is a citizen of (foreign nation) \_\_\_\_\_.

b. If the plaintiff is a corporation:

The plaintiff, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual:

The defendant, *(name)* \_\_\_\_\_, is a citizen of the State of *(name)* \_\_\_\_\_, OR is a citizen of *(foreign nation)* \_\_\_\_\_.

b. If the defendant is a corporation:

The defendant, *(name)* \_\_\_\_\_, is incorporated under the laws of the State of *(name)* \_\_\_\_\_, and has its principal place of business in the State of *(name)* \_\_\_\_\_.

Or is incorporated under the laws of *(foreign nation)* \_\_\_\_\_, and has its principal place of business in *(name)* \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

---

---

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

(See Attachment)

---



---



---



---

### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I ask the court to order, damages to Back door \$ 1,500  
 Upstair door \$ 250.00 Front door, \$ 1,200 punitive  
 damages \$ 500,000<sup>00</sup> For violation of my Fourth  
 Amendment Rights  
 Punitve, Because this has happenend before, due to TRAINGER enfo  
 cement of proper procedure.

### V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

#### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

07-01-2021

Signature of Plaintiff

Printed Name of Plaintiff

on or about 07-02-2019 @ 11:00 hrs  
I Carlton Leonard Rason was, painting the interior  
of my house, located @ 1201 3 Center St, Terre Haute  
Ind, 47802, when I noticed a Late model  
pick up truck pull to the front of my residence  
the passenger got out of the truck and entered my  
property at that time I exited my house to see  
what the man wanted, - the man informed me that  
my address was on his list for my grass to be cut.  
<sup>as he</sup> I ~~told~~ the man who sent him he told my ~~that~~  
he was sub contracted from the city to cut abondon  
or unkept lawns at that time he informed the  
guy that I just cut my grass which he agreed  
that my lawn was maintained but he said, my  
back yard could be cut, I told him I would come  
out and cut it later but right now, I don't need  
his services, so he left, pulling off down the  
street, I went back to my work, when in  
the attic I hear a commotion outside someone  
yelling "Come out, you don't belong here. This is  
a white mans house."

I look out my (crosses myself) and see the  
Code Enforcement truck with a woman standing outside  
The drivers door dressed in a Code Enforcement uniform  
behind her is a T. H. p. d. patrol car.,  
I then hear a "Boom," and "Footsteps down",  
yelling though my house come out, and  
making claims that I Burlaized my house,  
I hear several more doors Kicked in, Front door,  
upstair door, this officer screamed out that  
if I don't come out he was going to ("Blast  
your ass with this shotgun") at this point I  
don't know what's going on or if this is really  
a police officer or something else, after a few  
minutes several other police officers came in  
Blocked off the street and.. Officer Kevin Barnett  
was a police officer that I recognized so that when  
I came out of my attic to ask what was going  
on and was told they thought this house belongs  
to a white person named Stephen Sutzer and that  
I had broke in, a house, I showed them that  
I owned the house and was living here and  
remodeling, I was roughed up hurting me skin lot.

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney \_\_\_\_\_

Printed Name of Attorney \_\_\_\_\_

Bar Number \_\_\_\_\_

Name of Law Firm \_\_\_\_\_

Street Address \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

E-mail Address \_\_\_\_\_